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Biological Effects from RF Radiation at Low-Intensity Exposure, based on the BioInitiative 2012 Report, and the Implications for Smart Meters and Smart Appliances

Introduction and Conclusions

The Biological Effects Chart, at the end of this document, has been produced using data from a massive new review of the medical research literature on the biological effects of electromagnetic fields. That review is called the BioInitiative 2012 Report.[2] The purpose of the Biological Effects Chart is to show the radiofrequency (RF) exposure levels at which biological effects were found in 67 studies from the RF Color Charts of the BioInitiative 2012 Report, and then to compare those exposure levels to the following:

(1) current FCC Maximum Permitted Exposure (MPE) limits that govern Smart Meters and Smart Appliances in the United States
(2) new biologically based RF exposure limits proposed in the BioInitiative 2012 Report
(3) calculated RF exposure levels produced by a single Smart Meter at various distances
(4) calculated RF exposure levels produced by a single Smart Appliance at various distances

This comparison is based on RF exposure levels expressed as the RF power density (RF power per unit area). This comparison does not address other potentially important factors such as carrier continuity (continuous versus pulsed radiation) and modulation technique (the method used to impress information on the carrier), among others. The purpose is to identify what biological effects arise from exposure to RF power density levels like those produced by Smart Meters and Smart Appliances.

This comparison indicates the following:

(1) The current FCC Maximum Permitted Exposure (MPE) limits are so high that they provide no protection for the public from the biological effects found in any of the 67 studies.

(2) New biologically based RF exposure limits proposed in the BioInitiative 2012 Report are 1 million times lower than current FCC limits and would protect against the biological effects found in nearly all of the 67 studies.

(3) A single Smart Meter on a home can produce RF exposure levels that caused the biological effects found in either most or many of the 67 studies, depending on the distance from the Smart Meter.

(4) A single Smart Appliance in the home can produce RF exposure levels that caused the biological effects found in nearly half or fewer of the 67 studies, depending on the distance from the Smart Appliance. Multiple Smart Appliances in a home multiply the total exposure.

[1] The author holds a Ph.D. in Applied Physics from Harvard University, 1975.
[2] BioInitiative Working Group, Cindy Sage and David O. Carpenter, Editors, BioInitiative Report: A Rationale for Biologically-based Public Exposure Standards for Electromagnetic Radiation, December 31, 2012 (http://www.bioinitiative.org).

(5) A single Smart Meter on a nearest neighbor's home can produce RF exposure levels that caused the biological effects found in many of the 67 studies. A given home may have one to eight nearest neighbors, each with a Smart Meter, multiplying the total exposure in the given home.

Other observations:

(1) Most biological effects of RF exposure cannot be sensed by human beings. Examples are the onset of cancer, DNA damage, and fertility effects. One category of effects that can often be sensed includes neurological effects on sleep, memory, learning, and behavior.

(2) Unborn and very young children may be more affected by RF exposure than adults.

This document provides background information, an explanation of each feature of the Biological Effects Chart, and a detailed discussion of each of the conclusions and observations summarized above. That discussion begins on page 11.

Figure 1, on page 9 in this document, and the Biological Effects Chart, at the end of this document, are in color, and are most easily understood when viewed in color. But they can also be understood in black and white. To make that possible, key lines in Figure 1 and in the Biological Effects Chart are identified not only by color but also by line thickness and line style (solid versus dashed).

Terminology for Parts of the Electromagnetic Spectrum

Electromagnetic fields occur over a wide range of frequencies, referred to as the electromagnetic spectrum.[3] But the terms used for parts of that spectrum are not consistently named or defined. The BioInitiative 2012 Report uses the following definitions for two key parts of the electromagnetic spectrum:

extra low frequency (ELF): electromagnetic fields with frequencies from 1 to 300 Hz[4]
radiofrequency (RF): electromagnetic fields with frequencies from 100 kHz to 300 GHz[5]

Within the *radiofrequencies* lie the *microwave* frequencies. Microwaves, too, are variously defined. Here are two common definitions:

microwaves: electromagnetic fields with frequencies from 300 MHz to 300 GHz[6]
microwaves: electromagnetic fields with frequencies from 1 GHz to 100 GHz[7]

This document focuses on the biological effects of the frequencies at which the following devices operate. Those frequencies are shown in round numbers.

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[3] Explanation of units of measure for frequency: 1 hertz is 1 cycle per second. 1 kilohertz is equivalent to 1000 hertz. 1 megahertz is equivalent to 1000 kilohertz and to 1,000,000 hertz. 1 gigahertz is equivalent to 1000 megahertz and to 1,000,000 kilohertz and to 1,000,000,000 hertz. These units are abbreviated as follows: hertz (Hz), kilohertz (kHz), megahertz (MHz), and gigahertz (GHz).

[4] BioInitiative 2012 Report cited in footnote 2 on page 1, Section 26, Glossary of Terms and Abbreviations, page 3. The Report notes that the term Extremely Low Frequency is used in Europe and the term Extra Low Frequency is used in the United States. Wikipedia uses the term Extremely Low Frequency to refer to 3 to 300 hertz (http://en.wikipedia.org/wiki/Extremely_low_frequency).

[5] BioInitiative 2012 Report cited in footnote 2 on page 1, Section 26, Glossary of Terms and Abbreviations, page 5.

[6] (http://en.wikipedia.org/wiki/Microwaves)

[7] (http://en.wikipedia.org/wiki/Microwaves)

cell towers[8]	300, 400, 700, 800, 900, 950, 1800, 1900, 2100 MHz
Wi-Fi (most common type of WLAN)[9]	2400, 2500 MHz (predominant) 2600, 3600, 5000 MHz (emerging)
wireless laptops[10]	2400 MHz (predominant) 5000 MHz (emerging)
Smart Meters[11]	900, 2400 MHz (Smart Meters and Collector Smart Meters) 850 MHz (Collector Smart Meters only)
Smart Appliances[12]	2400 MHz

Note that that all of these devices operate at frequencies between 300 MHz and 5000 MHz. The frequencies at which Smart Meters and Smart Appliances operate are right in the middle of this range. According to one or more of the definitions given above, all of these frequencies may be referred to as either *radiofrequencies (RF)* or *microwaves*. Since the BioInitiative 2012 Report refers to these frequencies as *radiofrequencies* (*RF*), that term will be used here. But the term *microwaves* could have been used just as well.

The BioInitiative 2012 Report

The BioInitiative 2012 Report was developed by an international group of 29 individuals with expertise on the biological effects of electromagnetic fields, or on the related public-health issues.[13] As a group, these experts hold 20 PhD degrees, one DrSc degree, 9 MD degrees, one DVM degree, and four degrees of MSc, MA, MPH, or MSPAS. These experts come from ten countries, each with the following number of participants:

USA	10	India	2
Sweden	6	Italy	2
Austria	2	Denmark	1
Canada	2	Russia	1
Greece	2	Slovak Republic	1

The goal of the BioInitiative Report is to present "a solid scientific and public health policy assessment that is evidence-based." The report was prepared "independent of governments, existing bodies and industry professional societies that have clung to old standards."[14]

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[8] (http://en.wikipedia.org/wiki/Cellular_network), (http://en.wikipedia.org/wiki/GSM_frequency_bands), and (http://en.wikipedia.org/wiki/UMTS_frequency_bands)

[9] (http://en.wikipedia.org/wiki/WI-FI) and (http://en.wikipedia.org/wiki/List_of_WLAN_channels)

[10] (http://en.wikipedia.org/wiki/Wireless_LAN)

[11] Both the Landis-Gyr FOCUS AXR-SD and the General Electric I-210+c Smart Meters, being installed in Maryland, have FCC ID OWS-NIC514. They send and receive information in two microwave frequency ranges: (1) 902.3 to 926.9 MHz, and (2) 2405.8 to 2480.9 MHz (http://stopsmartmeters.org/wp-content/uploads/2012/01/OWS-NIC514-FCC-specifications.pdf). Collector Smart Meters have a third transmission frequency of 850 MHz (http://sagereports.com/smart-meter-rf/?page_id=210). They receive and retransmit the signals from Smart Meters to assure that those signals reach the antennas of the electric power company. It is not clear to me at this time whether Collector Smart Meters are employed in all installations of Smart Meters.

[12] The most likely transmitter/receiver in the Smart Appliances is the so-called ZigBee device. ZigBee devices operate at 865 MHz (in Europe) and 915 MHz (in the USA and Australia) as well as 2.4 GHz (worldwide) (https://en.wikipedia.org/wiki/ZigBee). But the Smart Meters first observed in installations in Maryland seem to require that the ZigBee devices operate at 2.4 GHz.

[13] BioInitiative 2012 Report cited in footnote 2 on page 1, cover page of the full report, as a single PDF file.

[14] BioInitiative 2012 Report cited in footnote 2 on page 1 , Section i, Preface 2012, page 2.

The Scope of the BioInitiative 2012 Report

The 1479-page BioInitiative 2012 Report considers the "content and implications of about 1800 new studies" since the last BioInitiative Report was published in 2007.[15] The 2012 Report contains 16 chapters that address key categories of biological effects. The 2012 Report also contains several chapters that address key public policy issues, such as the nature and shortcomings of the current exposure standards, and the bases for sufficient argument for changing those standards. Emphasized is the importance of weighing the magnitude of potential harm against the evidence of potential harm, to determine when protective action should be triggered.[16] Since Smart Meters are being mandated for entire populations in the United States, the magnitude of potential harm is considerable, so prudence dictates serious consideration of the increasing evidence of harm.

The Data Source for the Biological Effects Chart

The data for the appended Biological Effects Chart were drawn from the so-called RF Color Charts in the BioInitiative 2012 Report.[17] The RF Color Charts contain two charts:

> The first chart describes 67 studies of the biological effects of radiofrequency (RF) radiation.[18] Each study represents one or more biological effects found at a one value of the RF power density (RF power per unit area) or within a range of such values. These data are especially useful when considering whole-body exposure, which is the type of exposure that human beings receive from Smart Meters at a distance of 1 meter or more.[19] These data form the basis for the appended Biological Effects Chart.
>
> The second chart describes 68 studies of the biological effects of radiofrequency (RF) radiation.[20] In this chart, each study represents one or more biological effects found at one Specific Absorption Rate, or SAR value, or within a range of such values. A SAR value is the RF power absorbed per unit mass of the biological entity being irradiated. These data are especially useful when less than the entire body is irradiated, and at very close distances, such as when a cell phone irradiates the head.

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[15] BioInitiative 2012 Report cited in footnote 2 on page 1 , Section 1, Summary for the Public and Conclusions, 2012 Supplement: Summary for the Public – Ms. Sage, page 3.

[16] BioInitiative 2012 Report, cited in footnote 2 on page 1, Table 1-1, Section 23: The Precautionary Principle, 2012 Supplement: The Precautionary Principle – Mr. Gee, page 2.

[17] BioInitiative 2012 Report, cited in footnote 2 on page 1, Section 1, Summary for the Public and Conclusions, Table 1-2 Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure 2012, no page numbers.

[18] Each study in the first chart derives from one publication. But three publications contributed two studies, and one publication contributed three studies. As a result, the 67 studies derive from 62 publications. So the terms *studies* and *publications* have slightly different meanings as used here.

[19] More specifically, the power density values used in the first table are valid in the "far field" (also called the "radiative field") of the Smart Meter. For the type of antenna in a Smart Meter or a Collector Smart Meter, the far field should begin about two wavelengths from the meter (http://en.wikipedia.org/wiki/Far_field). A Collector Smart Meter transmits on three frequencies (850, 900, and 2400 MHz). The longest wavelength transmitted by a Collector Smart Meter is determined by the lowest frequency which it transmits, which is 850 MHz. That wavelength is 0.35 meters (about 1 foot). A Smart Meter transmits on two frequencies (900 MHz and 2400 MHz), so the lowest frequency transmitted by a Smart Meter is 900 MHz, and the longest wavelength it transmits is 0.33 meters (again about 1 foot). Smart Appliances are expected to transmit at 2400 GHz, with has a wavelength of 0.13 meters (about 5 inches). So for all three devices, the far field begins about 0.7 meters (about 2 feet), or less, from them. This document addresses distances from 1 meter (about 3 feet) up, so all such distances are in the far field for all three devices.

[20] Each study in the second chart derives from one publication. But two publications contributed two studies each. As a result the 68 studies derive from 66 publications. So the terms *studies* and *publications* have slightly different meanings as used here.

This is not the usual case for RF exposure from Smart Meters, so these data were not used for the appended Biological Effects Chart.

Criteria for Selection of the Studies in the RF Color Charts

The criteria used in the BioInitiative 2012 Report to select the studies for the RF Color Charts, and thus for the appended Biological Effects Chart, were the following:[21]

(1) A selection of good examples only. Not intended to be comprehensive.
(2) Peer-reviewed and published studies only.
(3) Good exposure data (numeric).
(4) Author(s) have clear methods and conclusions.
(5) Cover wide range of topics, such as genotoxicity, neurological, immune, cancers, behavior, attention, memory, sleep, etc.
(6) Cover wide range of exposure levels, with an emphasis on the lowest levels and the more recent studies.

Every study in the first chart of the RF Color Charts, and thus every study in the appended Biological Effects Chart based on that first chart, except one (Dumansky, 1974), was published after 1986. 1986 is the year of publication of the document on which the current FCC Maximum Permitted Exposure (MPE) limits are principally based.[22] That was 27 years ago, which is one factor in explaining why the current FCC MPE limits are out of date. The references for the studies in the RF Color Charts, and thus for the biological effects data in the appended Biological Effects Chart, are included in the reference list that immediately follows the RF Color Charts in the PDF file of the full BioInitiative 2012 Report.[23]

Explanation of the Appended Biological Effects Chart

The Horizontal Axis of the Biological Effects Chart

The studies are presented in order of increasing RF power density along the horizontal axis of the Biological Effects Chart. That order facilitates comparing effects observed at similar RF power densities. Each position along the horizontal axis of the Biological Effects Chart represents one study whose principal author and date of publication are written under that axis. The studies could just as well have been ordered alphabetically by the authors' last names, or numerically by the publication dates.

The Vertical Axis of the Biological Effects Chart

The vertical axis represents the RF power densities at which each study was conducted. These power densities cover a wide range of values, so a logarithmic vertical axis was employed. This approach permitted displaying 11 orders of magnitude on the Biological Effects Chart.[24] The units of measure

[21] The criteria were provided by Cindy Sage, co-editor of BioInitiative 2012, in a private communication, April 23, 2013.
[22] The current FCC exposure limits are based principally on a 1986 publication of the National Council on Radiation Protection and Measurements (NCRP). That publication is "Report No. 086 - Biological Effects and Exposure Criteria for Radiofrequency Electromagnetic Fields". The NCRP was chartered by the U.S. Congress in 1964, but is not a Government agency and is not subject to oversight by the Congress.
[23] BioInitiative 2012 Report cited in footnote 2 on page 1, Reported Biological Effects from Radiofrequency Radiation (RFR) at Low-Intensity Exposure Levels, sequential pages 112-121 in the 1479-page PDF version of the full Report.
[24] Each order of magnitude is a factor of 10.

selected for the vertical axis are milliwatts per square meter (mW/m^2).[25] These units work well for the wide range of power densities required for the vertical axis, making the length of the smallest number, 0.000001, not too much longer than the length of the largest number, 10000.

The selected units for the vertical axis also work well for relating the RF power density shown to the total RF power that an adult human would receive. The surface area of an adult human is about 2 square meters (m^2).[26] So the surface area that an adult human presents to an RF wave arriving from the front, or from the back, is about 1 square meter (m^2). So when an adult human faces an oncoming wave of radiation with a power density of, say, 10 milliwatts per square meter (mW/m^2), that human will receive a total of 10 milliwatts (mW) of radiation over the entire body. That is, the number describing the power density will be the same as the number describing the total power received, even though the units of measure are different in the two cases. So, when examining the vertical axis of the attached Biological Effects Chart, each number on that axis may be taken to mean *both* the power density (in mW/m^2) of the oncoming wave of RF radiation *and* the total RF power (in mW) received by an adult human when standing with the front, or the back, facing the direction from which the radiation is coming.

The Round Red Dots on the Biological Effects Chart

Each round **red** dot • on the attached Biological Effects Chart indicates the RF power density at which the study named on the horizontal axis, directly below the dot, was conducted. Some studies were conducted over a range of power densities. In such cases, the average value of the high and low ends of the range determines the location of the dot on the vertical axis. The range of power densities applicable is shown as a black vertical line through the dot. The top of the vertical line marks the high end of the range, and the bottom of the vertical line marks the low end of the range. On those vertical lines, the dots appear higher than the middle. That effect results from the logarithmic vertical axis, even though the dots are located at the true average value of the high and low ends of the range.

The Alphabetic Codes above the Dots on the Biological Effects Chart

A one- or two-letter code appears just above each of the dots on the Biological Effects Chart. Each code, such as “CB”, identifies the category into which the biological effects found by a given study fall. Those one- and two-letter codes are translated in the table on the Biological Effects Chart, first into the one or two words represented by the letters of the codes, and then into a fuller description of the category, as reported in the RF Color Charts of the BioInitiative 2012 Report. For example, the code “CB” stands for the words “Cancer, Brain” and represents a category that contains “Brain tumors and blood-brain barrier”.[27] Similarly, the code “CO” stands for the words “Cancer, Other” and represents a category that contains “Cancer (other than brain), cell proliferation”.

The Thick Horizontal Blue Line at the Top of the Biological Effects Chart

The thick horizontal blue line, which appears at the top of the Biological Effects Chart, represents the Maximum Permitted Exposure (MPE) limits of the Federal Communications Commission (FCC). These are the limits applicable to the general population for uncontrolled exposure for the frequencies that Smart

[25] 1 milliwatt (mW) is one-thousandth of a watt (W).
[26] The surface area of a man is about 1.9 square meters (m^2); and the surface area of a woman is about 1.6 square meters (m^2), both according to Wikipedia (http://en.wikipedia.org/wiki/Body_surface_area).
[27] The reference to blood-brain barrier refers to the weakening of the barrier that the body erects between the blood and the brain to prevent harmful entities circulating in the blood from entering the brain.

Meters, Collector Smart Meters, and Smart Appliances use: 2400 MHz, 900 MHz, and 850 MHz. The top edge of the blue line is the limit applicable to 2400 MHz. The bottom edge of the blue line is the limit applicable to 850 MHz. The limit applicable to 900 MHz falls in between.

Frequency (MHz)	**FCC Maximum Permitted Exposure (MPE) Limits**[28] (mW/m^2)	
2400	10,000	(Smart Meters, Collector Smart Meters, and Smart Appliances)
900	6000	(Smart Meters and Collector Smart Meters)
850	5700	(Collector Smart Meters)

However, those FCC limits apply to the time-average RF power density over a period of 30 minutes. So, pulsed signals, like those issued by Smart Meters and Smart Appliances, are permitted to assume even higher peak values, as long as the time-average over a period of 30 minutes is below the FCC limits shown.

The Thick Horizontal Yellow Line on the Biological Effects Chart

The thick horizontal yellow line, which appears about one-third from the bottom of the Biological Effects Chart, shows the new RF exposure limits proposed in the BioInitiative 2012 Report for chronic exposure to pulsed radiation. Pulsed radiation is the type of radiation that Smart Meters and Smart Appliances emit. The top of this line is located at 0.006 milliwatts per square meter (mW/m^2). The bottom of this line is located at 0.003 milliwatts per square meter (mW/m^2).[29]

New Biologically Based RF Exposure Limits Proposed in the BioInitiative 2012 Report[30]
(as expressed, equivalently, in various units of measure)

0.3 to 0.6	nanowatts per square centimeter (nW/cm^2)	(units used in BioInitiative 2012)
0.003 to 0.006	milliwatts per square meter (mW/m^2)	(units used in appended Chart)
3 to 6	microwatts per square meter ($\mu W/m^2$)	

The data from the 67 studies in the Biological Effects Chart indicate why this level might have been judged appropriate by the authors of the BioInitiative 2012 Report: This level would protect against the biological effects found by all but five of the 67 studies. The BioInitiative 2012 Report indicates that these proposed new limits "may need to change in the future, as new and better studies are completed." [31] Note that this level, which can also be expressed as 3 to 6 microwatts per square meter ($\mu W/m^2$), is in agreement with the level of 5 microwatts per square meter ($\mu W/m^2$) proposed by Dietrich Klinghardt, M.D., Ph.D., in his detailed video treatment of the health hazards of Smart Meters.[32]

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[28] Questions and Answers about Biological Effects and Potential Hazards of Radiofrequency Electromagnetic Fields, OET (Office of Engineering and Technology) Bulletin 56, Fourth Edition, Federal Communications Commission, August 1999. See Table 1(B), Limits for General Population/Uncontrolled Exposure, page 15.
(http://www.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet56/oet56e4.pdf)

[29] BioInitiative 2012 Report cited in footnote 2 on page 1 , Section 1, Summary for the Public and Conclusions, 2012 Supplement: Summary for the Public – Ms. Sage, pages 25-26.

[30] 1 milliwatt (mW) is one thousandth of a watt (W). 1 microwatt (μW) is one millionth of a watt (W). 1 nanowatt (nW) is one billionth of a watt (W). 1 centimeter (cm) is one hundredth of a meter (m). So, 1 square centimeter (cm^2) is one ten thousandth of 1 square meter (m^2).

[31] See footnote 29 above.

[32] Dr. Klinghardt's video, and further information about him, can be found on the following web sites:
(http://marylandsmartmeterawareness.org/smart-meter-news/dr-dietrich-klinghardt-smart-meters-emr-the-health-crisis-of-our-time) and (http://www.klinghardtacademy.com/BioData/Dr-Dietrich-Klinghardt.html).

The Thin Horizontal Green Lines on the Biological Effects Chart

The four thin horizontal **green** lines show the power density of the RF radiation emitted by a Smart Meter at four different distances. To determine these levels, I assumed that the Smart Meter is the type being installed in Maryland, as described in footnote 11 on page 3:

P = RF power output = 1 watt
g = antenna gain = 4 dBi = 2.5 (a pure number, a ratio)[33]

This Smart Meter has an RF power output, *P*, of approximately 1 watt. The antenna used in the Smart Meter is a variation of a vertical dipole antenna which provides a gain, *g*, of 4 dBi, or 2.5, in the horizontal direction. I have not accounted for absorption by obstructions, such as walls and other objects, which can lower RF power density levels. Nor have I accounted for reflections from walls or other objects, which can raise or lower RF power density levels. So the actual power densities would likely fall somewhere between the two extremes that could apply if these other factors had been considered. The RF power density, P_D, in watts per square meter (W/m^2) can be calculated from this equation:

$$P_D = g\left[\frac{P}{4\pi r^2}\right]$$

In the above equation, *r* is the distance, in meters, from the Smart Meter, in the horizontal direction. This equation can be understood this way: The radiation from the Smart Meter travels outward from the meter and is initially regarded as spreading uniformly over the surface of a sphere (centered on the Smart Meter) which has a radius, *r*, and thus a surface area of $4\pi r^2$. So the part of the equation in square brackets [ ] indicates the power density that would be produced, at a distance, *r*, if the radiation from the Smart Meter spread uniformly over the surface of that sphere. The antenna used in the Smart Meter increases the power density in the horizontal direction, at the expense of a decrease in the power density in the vertical direction, because all receivers of interest are in the horizontal direction. Those receivers include the antennas of the electric power company and the antennas of other Smart Meters in the area with which a given Smart Meter communicates. The antenna gain, *g*, accounts for this characteristic of the antenna and causes P_D to represent the power density in the horizontal direction.

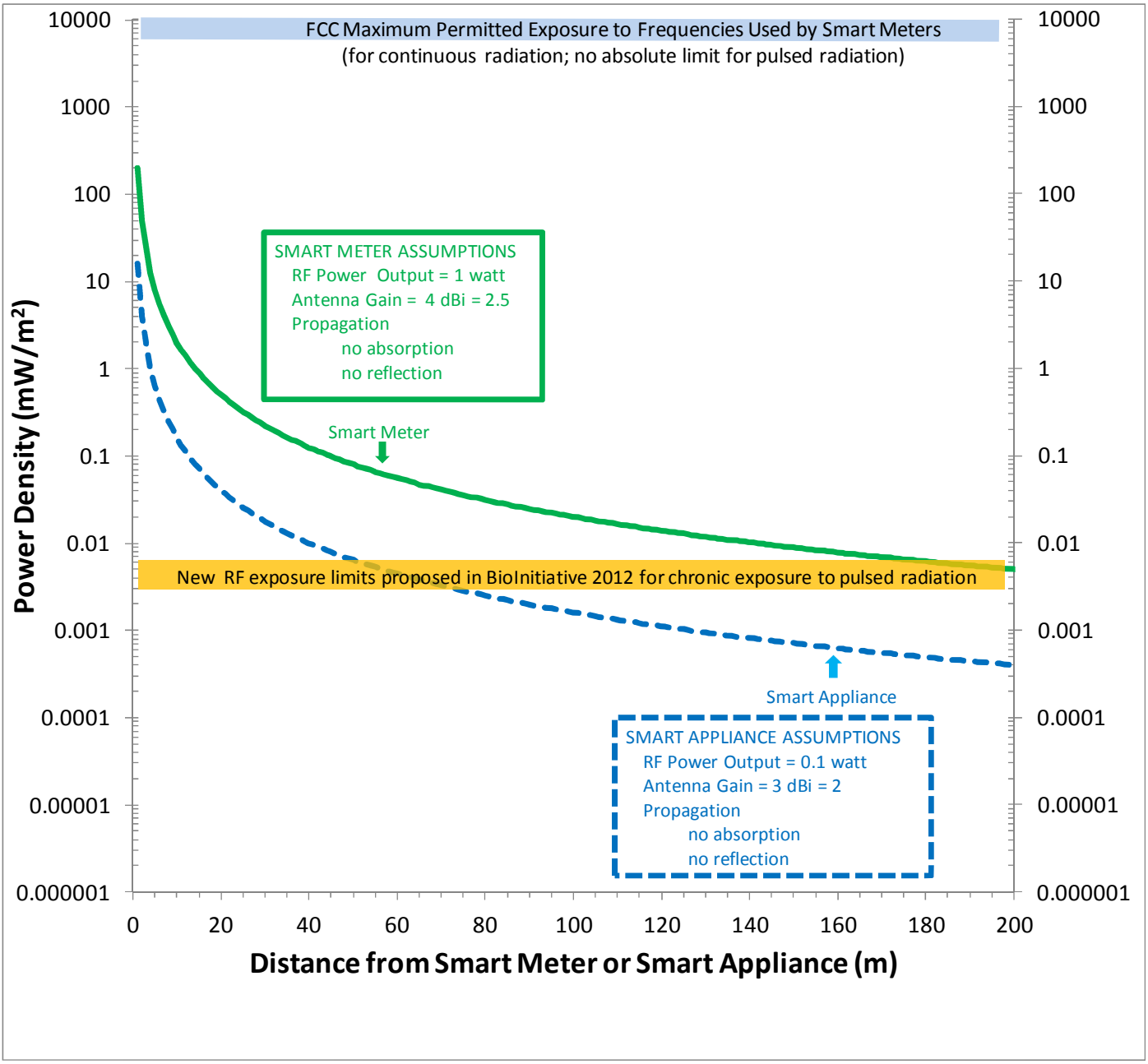
The RF power density, P_D, computed from the above equation is plotted in Figure 1 on page 9 as a function of the distance from the Smart Meter. The power density is expressed in units of milliwatts per square meter (mW/m^2) to match the units in the Biological Effects Chart under discussion. A logarithmic vertical axis is used for the power density, again to match the logarithmic vertical axis of the Biological Effects Chart. The vertical axis appears on both sides of Figure 1 to facilitate easier reading.

The power density is strongest near the Smart Meter and falls off quickly with increasing distance, but persists at lower levels to great distances. The power density of the Smart Meter drops to the maximum

[33] The antenna gain, *g*, is usually specified in dBi, which means the gain, in decibels, relative to an ideal isotropic antenna, which is an idealized antenna that radiates equally in all directions. The gain of the antenna in a Smart Meter (with FCC ID OWS-NIC514) is 4 dBi and translates to a factor of 2.5. That is, the power density in the horizontal direction is 2.5 times greater than it would be if the antenna radiated equally in all directions. In the case of Smart Meters, the power density in the vertical direction is reduced in favor of increased power density in the horizontal direction where all intended receivers are located. To access the reference, start at (http://transition.fcc.gov/oet/ea/fccid). In the box Grantee Code, enter OWS. In the box Product Code, enter –NIC514 (including the hyphen), press Search, click on the first entry Detail, and click on Test Report. This should take you to this location (https://apps.fcc.gov/eas/GetApplicationAttachment.html?id=1174749) which you cannot address directly. Then see page 3 of 66 of the document found.

exposure level proposed in the BioInitiative 2012 Report at a distance of about 180 meters. On the appended Biological Effects Chart, the four thin horizontal green lines show the power densities, taken from Figure 1, for distances of 1 meter (3 feet), 5 meters (16 feet), 20 meters (66 feet), and 100 meters (328 feet).

Figure 1: Smart Meter and Smart Appliance RF Power Densities versus Distance



The Thin Dashed Horizontal Blue Lines on the Biological Effects Chart

Smart Meters are designed to communicate wirelessly with new Smart Appliances that are now becoming available. The Smart Appliances contain RF transmitters and receivers of their own. Through the Smart Meters, the Smart Appliances can report, to the electric power company, data sufficient to identify the specific appliances and to indicate when they were installed or removed, and how much power they are

consuming throughout the day and the night, every day of the year. Less certain is whether the electric power company will be able to turn off the Smart Appliances by sending a wireless signal to them through the Smart Meter. (For example, the electric power company might want to turn off appliances that draw a lot of electricity at certain times of day, and in certain seasons, when the load on the electric power system is high. An example would be turning off the air-conditioner at midday in midsummer.)

Such Smart Appliances will increase the RF radiation inside each home. Verifiable data on the actual RF power output of the transmitters that will be used in the Smart Appliances is hard to find at present; but a likely value is 0.1 watt, since that is a common value used for other short-range wireless devices.[34] The antenna gain is assumed to be 3 dBi or 2.[35] The frequency of operation is assumed to be 2.4 GHz to communicate with the Smart Meters.[36]

The RF power density for Smart Appliances is calculated with the same equation used for Smart Meters above but with the different values for *P* and *g* just cited:

P = RF power output = 0.1 watt
g = antenna gain = 3 dBi = 2 (a pure number, a ratio)

The result for a single Smart Appliance is shown by the dashed blue line in Figure 1 on page 9. Once again, I have not accounted for absorption and reflection during propagation. Absorption can lower the power density. Reflection can lower or raise the power density. So the power densities shown in Figure 1 would likely fall somewhere between the two extremes that could apply if these other factors had been considered. The patterns of absorption and reflection inside homes vary greatly, so many different situations are possible.

The power density from a single Smart Appliance does not fall to the new maximum exposure level proposed in the BioInitiative 2012 Report until a distance of 50 meters (164 feet) from the Smart Appliance has been reached. So there will be no location within the typical home that will be that far from a Smart Appliance. Of course, over time, many such Smart Appliances may be purchased for a home, multiplying the total exposure produced.

In the appended Biological Effects Chart, the thin dashed blue lines show the RF power density, taken from Figure 1, for a single Smart Appliance at three distances: 1 meter (3 feet), 3 meters (10 feet), and 10 meters (33 feet) from the Smart Appliance. 10 meters is about at far from a Smart Appliance as a person can get inside the typical home with a single centrally located Smart Appliance.

[34] The most likely transmitter/receiver in the Smart Appliances is the so-called ZigBee device. These devices have RF outputs ranging from 0.001 watt to 0.1 watt, which is equivalent to a range of 1 milliwatt (mW) to 100 milliwatts (mW). (https://en.wikipedia.org/wiki/ZigBee)

[35] The assumed gain, *g*, in this case, is 3 dBi, which is based on the performance of an ordinary vertical dipole antenna. That is, the power density in the horizontal direction is 2 times greater than it would be if the antenna radiated equally in all directions.

[36] ZigBee devices operate at 865 (in Europe) and 915 MHz (in the USA and Australia), as well as 2.4 GHz (worldwide); but the design of the Smart Meters installed in Maryland seems to require that the ZigBee devices operate at 2.4 GHz. (https://en.wikipedia.org/wiki/ZigBee)

Conclusions and Observations

Current FCC Maximum Permitted Exposure (MPE) Limits Are Too High to Protect the Public

Because the FCC Maximum Permitted Exposure (MPE) limits are at power densities higher than the power densities addressed in all of the 67 studies, those limits provide no protection against the biological effects found in any of the 67 studies, no matter what the source of the RF radiation.

Further, the FCC Maximum Permitted Exposure limits apply to each source of radiation, individually, not to the combined exposure from all sources. But a person will generally be exposed to radiation from a combination of sources. So the FCC Maximum Permitted Exposure limits not only are too high to protect a person from a single source of radiation, but also do not consider the actual exposure received by a person from multiple sources of radiation.

New Biologically Based RF Exposure Limits, Proposed in the BioInitiative 2012 Report, are 1 Million Times Lower than the FCC Limits, to Protect the Public

The new RF exposure limits proposed in the BioInitiative 2012 Report are about 1 million times lower (stricter) than the current FCC Maximum Permitted Exposure Limits in the frequency ranges at which Smart Meters, Collector Smart Meters, and Smart Appliances operate.

Comparison of RF Exposure Limits

BioInitiative 2012 Report (RF)	FCC MPE (850 to 2400 MHz)	Ratio (FCC/BioInitiative 2012)
.003 to .006 mW/m^2	5700 to 10,000 mW/m^2	950,000 to 3,000,000

As shown in the appended Biological Effects Chart, the new RF exposure limits in the BioInitiative 2012 Report are low enough to protect against the biological effects found in nearly all of the 67 studies covered by that Chart.

A Single Smart Meter Can Produce RF Power Density Levels Shown to Cause Biological Effects

The Biological Effects Chart enables a comparison between the RF power densities produced by a Smart Meter, at various distances from that Smart Meter, and the RF power densities that triggered biological effects in the 67 studies.

The power density at 1 meter (3 feet) from a Smart Meter is higher than the power density that triggered biological effects in 50 of the 67 studies.

The power density at 5 meters (16 feet) from a Smart Meter is higher than the power density that triggered biological effects in 26 of the 67 studies.

The power density at 20 meters (66 feet) from a Smart Meter is higher than the power density that triggered biological effects in 14 of the 67 studies.

This distance of 20 meters is likely as far from a Smart Meter as a person can get and still be inside the typical home. So living and sleeping on the side of a home that is farthest from the Smart Meter is helpful but still may not reduce the received power densities to biological insignificance. Further, one or more of the neighbors' Smart Meters may be closer and may thus be the stronger source.

The power density at 100 meters (328 feet) from a Smart Meter is higher than the power density that triggered biological effects in 6 of the 67 studies.

So, even at the distance of a football field from the Smart Meter, the power density received may still be biologically significant.

As shown in Figure 1, the RF power density from a Smart Meter does not drop down to the level of the proposed new RF exposure limits until distances of 180 to 200 meters from the Smart Meter are reached. In most residential communities, whether composed of single-family homes, townhomes, or apartments, it will not be possible to get sufficiently far away from *all* of the Smart Meters present in that community.

A Single Smart Appliance inside a Home Can Produce RF Power Density Levels Shown to Cause Biological Effects

Unfortunately, the problem of excess exposure to RF radiation will get worse as Smart Appliances are adopted. They contain their own internal RF transmitters and receivers. Those Smart Appliances are designed to communicate with Smart Meters and to report through the Smart Meters to the electric power company. The data the Smart Appliances report will be sufficient for the electric power company to identify which appliances you own, when you use them, and how much power they consume, throughout the day and the night. The electric power company may even be able to turn the Smart Appliances off by sending a wireless signal to the Smart Meter that is then transferred to the Smart Appliances, but that is less certain at this time.

When these Smart Appliances are installed in a home, they will significantly increase the radiation levels in that home for several reasons:

They will begin transmitting, and from distances very close to the residents.

The number of Smart Appliances in the home may increase with time as the residents gradually replace their old appliances with new Smart Appliances, increasing the total radiation level.

The Smart Meters will transmit more frequently, in order to communicate with the Smart Appliances.

Even a single Smart Appliance can produce RF power densities of concern. An inspection of the appended Biological Effects Chart indicates the following:

The power density at 1 meter (3 feet) from a Smart Appliance is higher than the power density that triggered biological effects in 32 of the 67 studies.

The power density at 3 meters (10 feet) from a Smart Appliance is higher than the power density

that triggered biological effects in 21 of the 67 studies.

The power density at 10 meters (33 feet) from a Smart Appliance is higher than the power density that triggered biological effects in 10 of the 67 studies.

These observations do not bode well for having 5, 10, or 15 Smart Appliances in a home. The RF radiation from even a few Smart Appliances, because they will be so close to the residents, may rival that of a home's more distant Smart Meter. And the RF radiation from a large number of Smart Appliances may exceed that of a home's Smart Meter.

A Single Smart Meter on a Neighbor's Home Can Produce RF Power Density Levels Shown to Cause Biological Effects

For some locations in a given home, the distance to a neighbor's Smart Meter may be less than the distance to the resident's own Smart Meter. Thus, a neighbor's Smart Meter may be the principal source of radiation for some locations in the given home. The Biological Effects Chart shows that a single Smart Meter can produce RF power densities found to cause biological effects even at distances greater than 20 meters, and certainly up to 100 meters. And the number of neighbors within that range can be large. A given single-family home in a residential community may have one to eight nearest neighbors, and even more next nearest neighbors, all within 100 meters (328 feet) of a given home, and each with a Smart Meter.

The problem of exposure from the neighbors' Smart Meters becomes more serious as the distances between adjacent homes, and thus the distances between adjacent Smart Meters, get smaller. So, generally speaking, residents of townhouses will receive more radiation from their neighbors' Smart Meters than residents of single-family homes. And residents of apartments will receive even more radiation from their neighbors' Smart Meters, depending on the location of the Smart Meters in the apartment buildings.

So Smart Meters are a community concern, not just an individual concern. To resolve the problems of RF exposure for a given home, it will be necessary to address all of the Smart Meters near that home. Smart Appliances, too, contribute to this concern. While, individually, they have a lower RF power output than a Smart Meter, the Smart Appliances of neighbors can also increase the RF exposure in the given home.

Fortunately, some states have offered an individual OPT OUT from the installation of a Smart Meter.[37] While such an OPT OUT is very helpful, and is definitely the ***vital first step***, the data on biological effects discussed here suggest the limitations of such an OPT OUT in resolving the problem of excess radiation from Smart Meters. There is no substitute for a roll back of all Smart Meters at the community level, or higher.

Most Biological Effects of RF Radiation Cannot be Sensed by Human Beings

Most biological effects of RF radiation cannot be sensed by human beings. This fact is evident from an inspection of the categories of biological effects from the RF Color Charts in the BioInitiative 2012 Report, as shown below. For example, humans cannot sense the onset of cancer, DNA damage, or fertility effects.

[37] Maryland, through the Maryland Public Service Commission, currently offers a temporary OPT OUT, with the future of that OPT OUT yet to be decided. And the Maryland House of Delegates is currently considering legislation (HB1038) that would make the OPT OUT permanent and would provide other protections for Maryland homeowners.

Categories of Biological Effects in the RF Color Charts of the BioInitiative 2012 Report

Code	Code Translation	Biological Effects Category
CB	Cancer, Brain	Brain tumors and blood-brain barrier
CO	Cancer, Other	Cancer (other than brain), cell proliferation
H	Heart	Cardiac, heart muscle, blood-pressure, vascular effects
MC	Metabolism, Calcium	Disrupted calcium metabolism
OD	Oxidation, DNA	Oxidative damage/ROS/DNA damage/DNA repair failure
R	Reproduction	Reproduction/fertility effects
S	Sleep	Sleep, neuron firing rate, EEG, memory, learning, behavior
SI	Stress, Immune	Stress proteins, HSP,[38] disrupted immune function

The principal category of biological effects that humans *can* often sense is the S (or Sleep) category. This category includes neurological effects on sleep, memory, learning, and behavior, among others. Unfortunately, not sensing these particular effects does not guarantee that other biological effects are not occurring.

RF Radiation May Affect Unborn and Very Young Children More Severely than Adults

The BioInitiative 2012 Report presents evidence that unborn and very young children may be more greatly affected by RF radiation than adults because unborn and very young children are in "critical phases of growth and development".[39]

Concern for unborn and very young children is shared by the American Academy of Pediatrics (AAP) which wrote to the U.S. Congress in support of a bill before the U.S. House of Representatives (H.R. 6358).[40] This bill would fund development of better founded RF exposure limits to protect against cell phones and other wireless sources of RF radiation. The AAP made the following statement:

> *The AAP strongly supports H.R. 6358's emphasis on examining the effects of radiofrequency (RF) energy on vulnerable populations, including children and pregnant women. In addition, we are pleased that the bill would require the consideration of those effects when developing maximum exposure standards. Children are disproportionately affected by environmental exposures, including cell phone radiation. The differences in bone density and the amount of fluid in a child's brain compared to an adult's brain could allow children to absorb greater quantities of RF energy deeper into their brains than adults. It is essential that any new standards for cell phones or other wireless devices be based on protecting the youngest and most vulnerable populations to ensure they are safeguarded through their lifetimes.*[41]

[38] HSP stands for Heat Shock Proteins. BioInitiative 2012 Report, cited in footnote 2 on page 1, Section 1, Summary for the Public and Conclusions, Table 1-2 Reported Biological Effects from Radiofrequency Radiation at Low-Intensity Exposure 2012, no page numbers.

[39] BioInitiative 2012 Report cited in footnote 2 on page 1, Section 1: Summary for the Public and Conclusions, 2012 Supplement: Summary for the Public – Ms. Sage, pages 8-10.

[40] Summary of H.R. 6358 can be found here: (http://marylandsmartmeterawareness.org/smart-meter-news/ask-your-congressional-rep-to-co-sponsor-h-r-6358). Full copy of H.R. 6358 can be found here: (http://thomas.loc.gov/home/gpoxmlc112/h6358_ih.xml).

[41] (http://ehtrust.org/wp-content/uploads/2012/12/aap_support_letter_cell_phone_right_to_know_act.pdf)

Smart Meters and Smart Appliances operate in the same frequency ranges as cell phones. Further, Smart Meters have twice the RF power output of the typical cell phone, as shown in the table below, and will be transmitting day and night. Emerging Smart Appliances will likely have about one-fifth the RF power output of the typical cell phone. But a given home may have several Smart Appliances; and they, too, will be transmitting day and night.

Device	RF Power Output				
Smart Meter[42]	1.115	watts	which is	1115	milliwatts
Typical leakage from a microwave oven[43]	1	watt	which is	1000	milliwatts
Typical cell phone[43]	0.5	watt	which is	500	milliwatts
Wireless LAN (802.11a)[43]	0.251	watt	which is	251	milliwatts
Wireless LAN (802.11n)[43]	0.250	watt	which is	250	milliwatts
Cordless phone[44]	0.230	watt	which is	230	milliwatts
Smart Appliance[45]	0.100	watt	which is	100	milliwatts
Wireless LAN (802.11 b, g)[43]	0.100	watt	which is	100	milliwatts
Typical laptop wireless LAN (Wi-Fi)[43]	0.032	watt	which is	32	milliwatts

A Final Note

The Smart Meter is the first source of RF exposure that is mandated for installation in every home in an entire region without the informed consent, or any consent, of the residents, and that is not under the control of the residents.

For other sources of RF exposure in the home, the residents have a choice to use them, or not to use them, and how often, and how long. Some of those other sources are included in the table above.

The Smart Appliances, while not mandated, will be the second source of RF exposure in a home that is not under the control of the residents -- if manufacturers of the Smart Appliances provide no way of turning off the RF transmitters in those appliances.

The only solution for the individual homeowner, at present, is the removal of the Smart Meter and the avoidance of the Smart Appliances. This is a vital first step; but it is only a partial solution for a given home, because the radiation from the neighbors' Smart Meters and Smart Appliances will cross property boundaries. Collaboration with the neighbors on reducing exposure levels is needed; and a solution at the community level, or higher, will be even more effective.

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[42] The Landis+Gyr FOCUS AXR-SD and the General Electric I-210+c, being installed in Maryland, have FCC-ID OWS-NIC514 which indicates that they send and receive information in two microwave frequency ranges: (1) 902.3 to 926.9 MHz, and (2) 2405.8 to 2480.9 MHz. The RF power output in the first frequency range is 0.968 watts. The RF power output in the second frequency range is 0.147 watt. These values sum to the 1.115 watts shown here, to provide an indication of the total RF power output capability of a Smart Meter. I have used an approximate value of 1 watt for the RF power output of a Smart Meter throughout this document (http://stopsmartmeters.org/wp-content/uploads/2012/01/OWS-NIC514-FCC-specifications.pdf).

[43] The RF power output levels come from this web site: (http://en.wikipedia.org/wiki/DBm). 1 watt equals 1000 milliwatts.

[44] Panasonic specifies the power output of its DECT 6.0 cordless telephone Model KXTG1061 as 115 milliwatts for the handset and another 115 milliwatts for the base station, for a total capability of 230 milliwatts.

[45] For a reference, see footnote 34 on page 10.

June 11, 2013

Reported Biological Effects from RF Radiation at Low-Intensity Exposure in Each of the 67 Studies Referenced in the "BioInitiative 2012" Report (Cell Tower, Wi-Fi, Wireless Laptop, and Smart Meter Power Densities)

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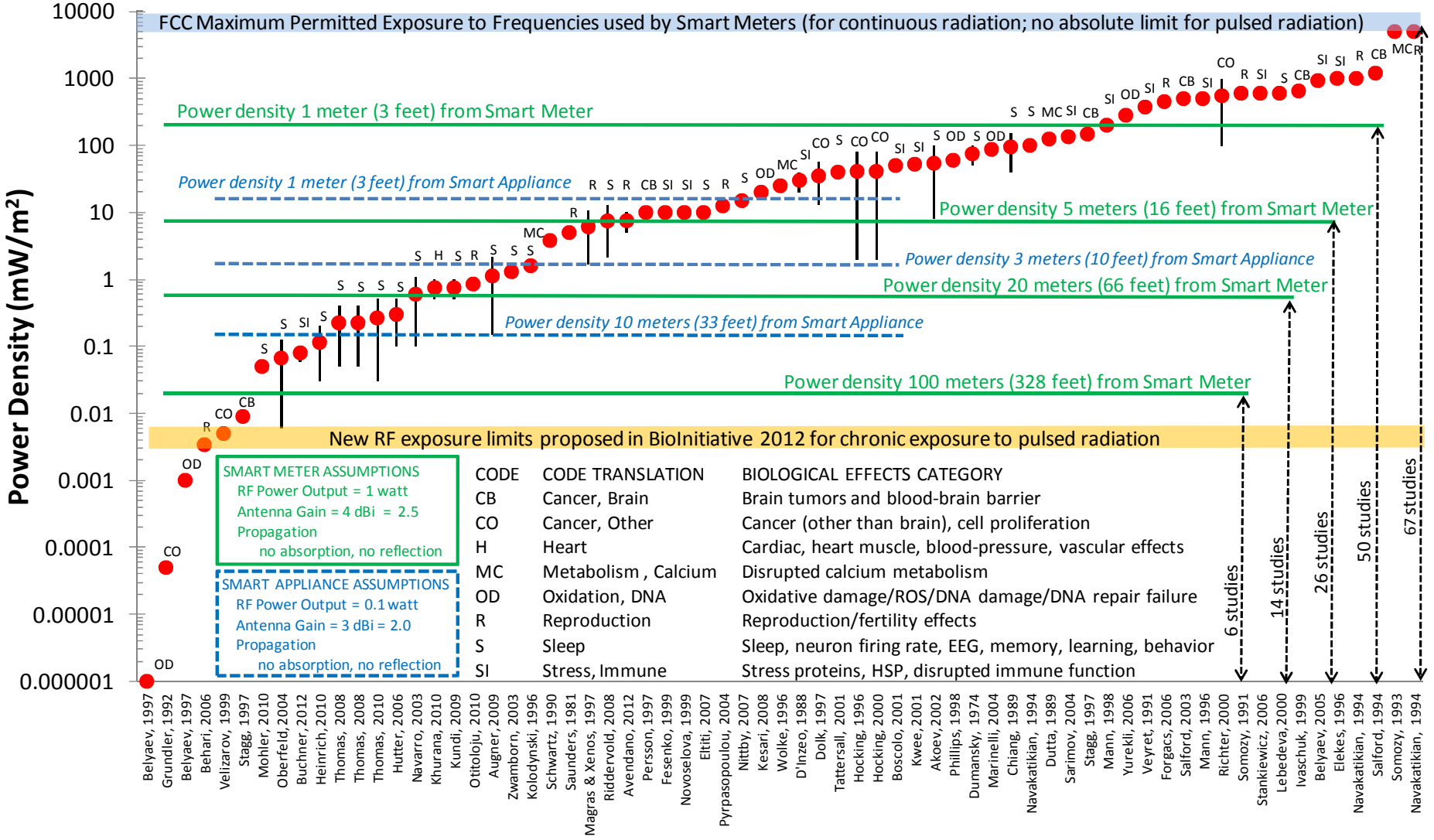
Reference for data dots (red), data range indicators (vertical black lines through red dots), biological effects categories for the red dots, and new proposed limits (yellow line): BioInitiative Working Group, Cindy Sage and David O. Carpenter, Editors. BioInitiative Report: A Rationale for Biologically-based Public Exposure Standards for Electromagnetic Radiation at www.bioinitiative.org, December 31, 2012. For references for other information on this chart, including the FCC Maximum Permitted Exposure limits, and the power densities of Smart Meters and Smart Appliances, see accompanying paper.



Principal Investigator of Study, and Year of Publication